



[WWW.RIVKINRADLER.COM](http://WWW.RIVKINRADLER.COM)

926 RXR Plaza  
Uniondale, NY 11556-0926  
T 516.357.3000 F 516.357.3333

**KENNETH A. NOVIKOFF**  
PARTNER  
(516) 357-3110  
[Kenneth.Novikoff@rivkin.com](mailto:Kenneth.Novikoff@rivkin.com)

April 14, 2020

**VIA ECF**

Hon. Robert W. Lehrburger  
United States District Court  
Southern District of New York  
500 Pearl Street, Room 1960  
New York, NY 10007

Re: Jose Mario Perez, Jr. v. 33<sup>rd</sup> Street Investors I LLC, et al.  
Docket No.: 1:19-cv-01392 (ALC)(RWL)

Dear Judge Lehrburger:

The law firm of Rivkin Radler, LLP is counsel to the landlord of the subject premises, 33<sup>rd</sup> Street Investors I LLC ("33 Street Defendant").

We write pursuant to Your Honor's Order Dated April 13, 2020, and in response to Plaintiff's letter motion to compel Wattle Café LLC to respond to Plaintiff's First Set of Document Demands and Interrogatories (collectively referred herein as "Demands"). Our client, 33<sup>rd</sup> Street Defendant/landlord served its' responses to Plaintiff's Demands on January 10, 2020. Accordingly, Plaintiff directed the letter motion at Levin-Epstein & Associates, counsel to the tenant Wattle Café Defendant. 33<sup>rd</sup> Street Defendant remains open to discussing an early resolution to this matter.

Thank you for your time and attention to this matter.

Respectfully submitted,

RIVKIN RADLER LLP

/s/

Kenneth A. Novikoff

cc: All counsel (by ECF)